

LEE LITIGATION GROUP, PLLC

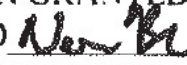
148 WEST 24TH STREET, 8TH FLOOR
NEW YORK, NY 10011
TEL: 212-465-1188
FAX: 212-465-1181
INFO@LEELITIGATION.COM

WRITER'S DIRECT: (212) 465-1188
cklee@leelitigation.com

May 14, 2021

Via ECF:

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 5/17/2021

Re: *Washington et al v. Senior Ride Transportation, LLC et al*
Case No. 21-cv-01907-VSB

Dear Judge Broderick:

This firm represents Plaintiffs in the above-referenced matter. We write, jointly with counsel for Defendants, to respectfully request a stay in the above-referenced action pending the completion of parties' contemplated mediation to be held on July 1, 2021.

After several discussions, the parties have agreed to engage in private mediation with third-party mediator, Mr. Martin Scheinman on July 1, 2021. This date is the earliest date that Mr. Scheinman, whom the parties found mutually agreeable, had available that worked for all parties and counsel involved.

In addition to requesting a stay until July 1, 2021, parties request the issuance of a new briefing schedule regarding Defendants' April 19, 2021 Motion to Dismiss. On April 21, 2021, the Court issued its briefing schedule for the motion, which granted Plaintiff until May 19, 2021 to file its opposition. Given the settlement discussions held between the parties, and the agreement to mediate on July 1, 2021, parties jointly propose the following briefing schedule:

- Plaintiffs to file any amended complaint by July 15, 2021;
- If no amended complaint is filed, Plaintiffs shall serve any opposition to the motion to dismiss by July 15, 2021;
- Defendants' reply, if any, shall be served by July 29, 2021.

Additionally, the parties request that they report to the Court concerning the outcome of the mediation in a joint letter by July 8, 2021. If the parties are unable to reach a resolution at mediation, the parties propose that they with their joint letter submit a Case Management Plan and Scheduling Order.

The parties thank the Court for its time on this matter.

Respectfully submitted,

/s/ CK Lee

CK Lee, Esq.